

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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(Admission *pro hac vice* pending)

*PROPOSED ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**NOTICE OF DEBTOR'S MOTION FOR AN ORDER APPOINTING  
RANDI S. ELLIS AS LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS**

**PLEASE TAKE NOTICE** that, on the date set by the Court pursuant to a proposed Order Shortening Time ("OST") and Application submitted herewith, LTL Management LLC, the debtor in above-captioned chapter 11 case (the "Debtor"), by and through its counsel, shall move (the "Motion") before the Honorable Michael B. Kaplan, United

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for entry of an order, pursuant to sections 105(a) and 524(g)(4)(B)(i) of the Bankruptcy Code, appointing Randi S. Ellis as the legal representative for future talc claimants in the Debtor's chapter 11 case.

**PLEASE TAKE FURTHER NOTICE** that, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Office of the United States Trustee for the District of New Jersey, (b) the top law firms representing talc claimants against the Debtor, as identified in the Debtor's chapter 11 petition, (c) counsel to the Debtor's non-debtor affiliates, Johnson & Johnson Holdco (NA) Inc. and Johnson & Johnson, (d) Randi S. Ellis, the proposed future claimants' representative and her proposed counsel and (e) any other party entitled to notice in accordance with any OST entered by the Court.

**PLEASE TAKE FURTHER NOTICE** that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: April 10, 2023

**WOLLMUTH MAHER & DEUTSCH LLP**

/s/ Paul R. DeFilippo

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